

RP 2/20/2020

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

FILED
CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

225 Cadman Plaza East, Brooklyn, New York 11201

★ FEB 18 2020 ★

Re: COMPLAINT: SCHEDULING ORDER CV-19-6791 (RPK)

BROOKLYN OFFICE

TO WHOM IT MAY CONCERN:

I have answered this document in writing, signed it then hand it to the two detectives sent to my home on behalf of MILMAN LABUDA LAW GROUP PLLC Attorneys for Plaintiff

As it appears everything in this complaint is bogus and insulting to the fact. The allegations are not true and the company never had such an image. The company had business for 9 years with many of highly respected clients in medicine, automotive and different events. Never had one complaint!

THE ALLEGATIONS IN THE NUMBERED PARAGRAPHS IN THIS COMPLAINT ARE NOT TRUE AND ARE MADE UP.

NAGWA IS MY WIFE HAD NOTHIN TO DO WITH THE OFFICE WORK, WAS JUST CONSULTANT ON TV PRODUCTION IF ANY. NEVER BEEN AN ACTIVE PARTNER.

The Company is out of business since 2017.

In the past new vision designed only mailers upon Doug Filardo request approved by Subaru Corporate then, and mailed to the target market approved at his time by Doug Filardo. The office never done any advertising for Doug other than design the card and send it to print and mailing through different vendors. This was the job of an administrative employee at the office at this time. Any transaction or communication was done upon Doug Filardo approval and satisfaction. The office has never done any transaction or communication with Star Subaru. Doug Filardo was always satisfied with the work done and continues to do business with the company for years. We only produced one video, which he claims was not used and never pay for it then.

I had no clue or knowledge of these scams advertising, youtube video or other claims in this complaint. The Internet is full of scams. The company never used youtube or other internet social media to promote the business.

Thank You
John Alexander

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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**STAR AUTO SALES OF QUEENS LLC
d/b/a STAR SUBARU,**

Plaintiff,

-against-

COMPLAINT

**HANIE ISKANDER a/k/a "John Alexander"
AND NAGWA YOUSEIF a/k/a "Nagwa F Youseif,**

Defendants.
-----X

Plaintiff, Star Auto Sales of Queens LLC d/b/a Star Subaru ("Star Subaru" or "Plaintiff") brings this Complaint by and through its attorneys, Milman Labuda Law Group PLLC, against Defendants Hanie Iskander a/k/a John Alexander ("Alexander") and Nagwa Youseif a/k/a Nagwa F Youseif ("Youseif") (collectively, "Defendants") in the above-captioned action and hereby alleges as follows:

NATURE OF ACTION

1. Plaintiff brings this Complaint against Defendants for (1) fraud and deceit; (2) aiding and abetting of fraud; (3) civil conspiracy of fraud; (4) unjust enrichment; (5) aiding and abetting breach of fiduciary duty; (6) conversion; (7) civil conspiracy of conversion; (8) breach of contract; and (9) constructive trust.

JURISDICTION AND VENUE

2. This Court has diversity jurisdiction over this action pursuant to 28 U.S.C. § 1332 since the controversy involves citizens of different states and the value of the amount in controversy exceeds \$75,000, exclusive of attorney' fees, costs and interest.

Case 1:19-cv-06791-RPK-ST

SAINT PETERSBURG FL

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USA
FOREVER

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DISTRICT OF NEW YORK
225 Cadman Plaza East, Brooklyn,
New York 11201

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